

Remarks

The Applicants have amended independent Claims 29, 33 and 40 to recite that at least substantially all of the ultra-fine fibers are entangled with each other "such that there is substantially no entanglement between bundles of ultra-fine fibers." Support for these amendments may be found in the Applicants' Specification, such as on page 22 at lines 12-16. The language in that portion of the Specification is a translation from the original Japanese language and contains wording that is somewhat awkward with respect to proper English. Specifically, "is little observed" is an awkward phrase, yet readily means, to those skilled in this art, that there is minimal entanglement between the bundles of ultra-fine fibers or that there is substantially no entanglement between the bundles of ultra-fine fibers. Hence, the Applicants respectfully submit that the changes to Claims 29, 33 and 40 are fully supported.

Entry of those changes into the official file is respectfully requested.

Claims 29, 32-38, 40, 42 and 44-45 stand rejected under 35 U.S.C. §103 over the combination of Kamath with Kusunose. The Applicants note with appreciation the Examiner's detailed comments applying that combination against those claims. The Applicants nonetheless respectfully submit that one skilled in the art would not make the combination as set forth in the rejection and, in any event, the combination would result in a completely different structure.

The rejection frankly acknowledges that Kusunose does not disclose a tensile strength of 70 N/cm or more, a 10% modulus in the length direction of 8 N/cm or more and tear strength of 3 to 50 N. The Applicants agree. Thus, the rejection turns to Kamath to cure these deficiencies. However, the Applicants respectfully submit that Kusunose fails to disclose additional aspects of Claims 29, 33 and 40. In particular, the Applicants respectfully submit that Kusunose fails to recite that at least substantially all of the ultra-fine fibers are uniformly entangled with each other in the thickness direction as previously claimed and that the ultra-fine fibers are entangled with each other such that there is substantially no entanglement between bundles of ultra-fine fibers. In fact, the Applicants respectfully submit that Kusunose teaches in the opposite direction. Such opposite direction teachings are classic indicators of non-obviousness.

In that regard, the Applicants invite the Examiner's attention to column 5 beginning with line 50 which refers to Fig. 1 and is duplicated below for the Examiner's convenience.

Referring to FIG. 1, the numerous fibrous bundles are entangled with each other. However, they are divided into neither small

bundles nor individual filaments, nor are they broken. That is, all of the fibrous bundles in FIG. 1 are maintained in their original configuration even after the non-woven fabric forming operation, due to the high adhering strength between the individual filaments.

This disclosure is quite clear in that it states that the fiber bundles are entangled with each other. This is the opposite of what the Applicants do since they seek to have substantially no entanglement between bundles of ultra-fine fibers.

These teachings are followed by additional teachings which are also quite instructive and are opposite teachings. This disclosure may be found in column 6 in the paragraph beginning at line 22 which is also reproduced below for the Examiner's convenience.

If a non-woven fabric is produced from fibrous bundles in which the individual filaments are not adhered to each other, the bundles are completely divided into individual filaments by the action of needle-punching or jets of fluid. The resultant non-woven fabric has the internal structure indicated in FIG. 7. Such a type of non-woven fabric has disadvantages in that it is not highly elastic nor is bulky. Therefore, it is unsuitable as a substratum sheet for artificial leather.

This disclosure states that a non-woven fabric having individual filaments entangled with each other "has disadvantages" and is thus "unsuitable as a substratum sheet for artificial leather."

The Applicants respectfully submit that these teachings are quite clear and lead those skilled in the art away from the subject matter of Claims 29, 33 and 40, which specifically state that there is substantially no entanglement between bundles of ultra-fine fiber. As a consequence, the Applicants respectfully submit that Kusunose leads those skilled in the art away from the Applicants' claimed subject matter.

Hypothetically combining Kamath with Kusunose does nothing to cure the fact that Kusunose leads those skilled in the art away from the subject matter of Claims 29, 33 and 40. Thus, in an instance where one skilled in the art is deliberately avoiding substantial entanglement between bundles of ultra-fine fibers, one skilled in the art would surely not look to Kusunose and would be led away from that disclosure. Thus, one skilled in the art would have no incentive to combine Kamath with Kusunose.

Moreover, even if one skilled in the art were to import the teachings of Kamath into Kusunose as recited in the rejection, the resulting structure would be a multiplicity of fibrous bundles entangled with each other. However, that is not what the Applicants claim, instead, the

Applicants cause substantially uniform entanglement of the ultra-fine fibers with each other such that there is substantially no entanglement between bundles of ultra-fine fibers. Hence, the combination is inapplicable to Claims 29, 32-38, 40, 42 and 44-45. Withdrawal of the rejection is respectfully requested.

Claim 43 stands rejected under 35 U.S.C. §103 over the combination of Nakamae with Kusunose. The Applicants respectfully submit, however, that Nakamae fails to cure the deficiencies set forth above with respect to Kusunose. Withdrawal of the rejection is accordingly respectfully requested.

Claims 47-48 stands rejected under 35 U.S.C. §103 over the combination of Katayama with Kusunose. The Applicants respectfully submit, however, that Katayama fails to cure the deficiencies set forth above with respect to Kusunose. Withdrawal of the rejection is accordingly respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,



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